IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

		§		
Applicants:	Mallikarjun Chadalapaka	§	Conf. No.:	8720
		§		
Serial No.:	10/666,174	§	Examiner:	Thomas J. Dailey
		§		
Filed:	September 18, 2003	§	Art Unit:	2152
		§		
For:	Method and Apparatus for	§	Atty. Dkt. No.:	200312982-1
	Acknowledging a Request for	§		(HPC.0563US)
	Data Transfer	§		

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

<u>**REPLY BRIEF**</u>

Sir:

      The following sets forth Appellant's Reply to the Examiner's Answer dated July 22,

2010.

A.   REPLY TO EXAMINER'S ANSWER REGARDING THE § 103 REJECTION OF CLAIMS 1-6, 24 OVER WENDT AND SATRAN

As discussed in detail in the Appeal Brief, it is clear that the hypothetical combination of Wendt and Satran fails to provide any teaching or hint of the following claimed subject matter:

- determine whether the request [from the first protocol layer received at the second protocol layer, both part of the same protocol stack] for the data transfer contains a request for acknowledgement of completion of the data transfer;

- if the request for data transfer does contain a request for acknowledgement of the completion of the data transfer, set a variable in memory to wait for an event corresponding to the completion of the request for data transfer and send an acknowledgement to the first protocol layer upon the occurrence of the event.

The Examiner conceded that Wendt fails to disclose the foregoing claim elements. Examiner's Answer at 4-5. However, contrary to the assertion by the Examiner, the secondary reference Satran also fails to provide any teaching or hint of the claimed subject matter conceded to be missing from Wendt, as explained in detail in the Appeal Brief.

According to claim 1, a second protocol layer (in a protocol stack) receives a request for data transfer from a first protocol layer (also in the protocol stack), where the inter-layer (**within a protocol stack**) request contains a request for acknowledgment of the completion of the data transfer. Satran is directed to teachings that are quite different from the claimed subject matter.

In the rejection, the Examiner relied upon the teachings relating to the Data-in PDU of Satran. *See, e.g.*, Examiner's Answer at 10. As explained in § 2.5.1.5 of Satran on page 51, the SCSI Data-in PDU is used for carrying SCSI data payload between an initiator and a target. Importantly, note that communication between an initiator and target occurs over a TCP connection. Satran, § 2.2.1, p. 24. Therefore, it is clear that the SCSI Data-in PDU **cannot**

constitute the request for data transfer sent from the first protocol layer to the second protocol layer (which are both part of the same protocol stack), as recited in claim 1.

Moreover, the Examiner erred in arguing that the last line on page 154 of Satran discloses that the Data-in PDU "is part of a read request," and thus constitutes "a request for data transfer." Examiner's Answer at 10. The last line on page 154 of Satran actually states: "The SCSI Data-in PDU for READ operations has the following format:". There is no hint here that the Data-in PDU is a request for data transfer, since § 2.5.1.5 of Satran on page 51 makes it clear that the SCSI Data-in PDU is used for carrying SCSI data payload between an initiator and a target (over a TCP connection).

Even more fundamentally, exchanging a data payload PDU between an initiator and a target over a TCP connection has nothing to do with receiving, by a second protocol layer, a request for data transfer from a first protocol layer, where both the first and second protocol layers are part of the same protocol stack.

Providing an acknowledgement in an SCSI Data-in PDU, as taught by Satran, has nothing to do with determining whether a **request** for data transfer (**initiated** by a first protocol layer) contains a request for acknowledgement of completion of the data transfer. As specifically taught by Satran in § 9.7.2, a **target** (across a TCP connection) sets the acknowledge bit of the SCSI Data-in PDU to a value "1" to indicate that the target requests a positive acknowledgement from the initiator for data received. A target of a data transfer operation setting an acknowledgement in a data payload PDU (Data-in PDU) is completely different from a first protocol layer initiating a request for a data transfer, where such request for data transfer contains a request for acknowledgement of completion of data transfer, and the request is sent to

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a second protocol layer (that is part of the same protocol stack as the first protocol layer), as recited in claim 1.

In view of the foregoing and in view of the arguments set forth in the Appeal Brief, the obviousness rejection of the foregoing claims is clearly erroneous.

CONCLUSION

The remaining arguments in the Examiner's Answer have already been addressed in the Appeal Brief.

In view of the foregoing, and in view of the arguments presented in the Appeal Brief, reversal of all final rejections is respectfully requested.

Respectfully submitted,

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/Dan C. Hu/
Dan C. Hu
Registration No. 40,025
TROP, PRUNER & HU, P.C.
1616 South Voss Road, Suite 750
Houston, TX 77057-2631
Telephone: (713) 468-8880
Facsimile: (713) 468-8883